

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

IN RE:	:	
	:	
APPLICATION OF MESSAGE CENTER	:	DOCKET NO. 320
MANAGEMENT, INC. AND NEW CINGULAR	:	
WIRELESS PCS, LLC FOR A CERTIFICATE OF	:	
ENVIRONMENTAL COMPATIBILITY AND	:	
PUBLIC NEED FOR THE CONSTRUCTION,	:	
MAINTENANCE AND OPERATION OF A	:	
TELECOMMUNICATIONS FACILITY OFF	:	
GREENSWOOD ROAD EAST (ROUTE 44),	:	
NORFOLK, CONNECTICUT	:	JANUARY 17, 2007

POST HEARING BRIEF OF INTERVENOR
CELLCO PARTNERSHIP d/b/a VERIZON WIRELESS

On or about September 7, 2006, Message Center Management, Inc. ("MCM") and New Cingular Wireless PCS, LLC ("Cingular") (collectively the "Applicant") submitted an application to the Connecticut Siting Council ("Council") for a certificate of environmental compatibility and public need for the construction, maintenance and operation of a telecommunications facility in the Town of Norfolk, Connecticut (the "Town"). The proposed facility would be located on a 149-acre parcel located north of Greenwoods Road East (U.S. Highway 44) in Norfolk, owned by the Town. (Applicant's Exhibit ("Exh.") 1).

On October 10, 2006, the Council granted intervenor status to Cellco Partnership d/b/a Verizon Wireless ("Cellco"). Cellco had identified a need to provide improved PCS service to its customers in the Norfolk area and identified the proposed MCM facility as a structure that could help satisfy a portion of that need. In support of its position, Cellco responded to

interrogatories from the Council on November 17, 2006 and provided testimony at the Council's December 19, 2006 public hearing.

The Cellco Facility

The Cellco facility would consist of 12 panel-type PCS antennas mounted at the 160-foot level on the 180-foot MCM tower. Cellco's equipment would be installed in a 12-foot by 30-foot equipment shelter located near the base of the tower within the facility compound. (Cellco Exh. 1, Response No. 8). Cellco would also install a back-up, diesel-fueled generator in a segregated 12-foot by 10 foot generator room within its equipment shelter. (Id.)

Cellco's Need

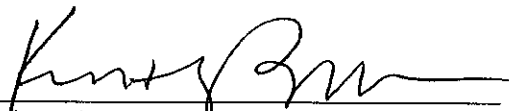
Cellco has only recently started activating PCS sites throughout Litchfield County however, none of these sites are in the Norfolk area. Cellco, therefore, has no coverage in this area. The Docket No. 320 record contains ample written evidence and testimony that Cellco antennas at the 160-foot level on the proposed 180-foot tower would provide quality wireless service and satisfy Cellco's immediate need for coverage in the easterly portions of Norfolk. The proposed Cellco facility would provide coverage to a 6.5 square mile area in the easterly portion of Norfolk and southwesterly portion of Colebrook including a 2.6 mile portion of Route 44. The proposed site would fill a significant portion of an existing gap in coverage between Cellco's recently approved Colebrook SW cell site and Cellco's planned Norfolk West cell site. (Cellco Exh. 1, Response No. 1).

Conclusion

The evidence in the Docket No. 320 record supports Cellco's need for the installation of antennas on the proposed MCM tower. The MCM tower as proposed in the Docket No. 320 application, will provide Cellco with significant coverage relief in the Norfolk area, in particular,

along the heavily traveled Route 44. This evidence remains unfuted. Cellco therefore respectfully request that the Council approve MCM's Docket No. 320 application.


Respectfully submitted,
CELLCO PARTNERSHIP d/b/a VERIZON
WIRELESS

By 
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Its Attorney

CERTIFICATION

I hereby certify that on the 17th day of January, 2007, a copy of the foregoing was mailed,
postage prepaid, to the following:

Christopher B. Fisher, Esq.
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Kenneth C. Baldwin